

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:	§	
	§	
ALLAN L. REAGAN	§	CASE NO. 20-11161-tmd
	§	
	§	
DEBTOR	§	CHAPTER 11

**JOINDER TO OBJECTION OF CREDITOR VILLAGE @ LA ORILLA LLC TO THE
FIRST AMENDED PLAN OF REORGANIZATION**

[Relates to Docket No. 93]

TO THE HONORABLE TONY DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Creditor THE BANK OF AUSTIN, by and through its undersigned counsel, hereby submits this Joinder to the Objection of Creditor @ La Orilla LLC ("VLO") to the Debtor's First Amended Plan of Reorganization ("VLO's Objection") and, in support hereof, states as follows:

JOINDER

1. VLO adopts the Subchapter V Trustee's Limited Objection to the Debtor's First Amended Plan, except for paragraph 2.9 and the Prayer thereof. The Bank of Austin joins with VLO's Objection.

2. It is the understanding of VLO and The Bank of Austin that the excepted paragraph of the Trustee's Objection is the paragraph 2.9 found on page 14 of 18 in the Trustee's Objection.

WHEREFORE PREMISES CONSIDERED, The Bank of Austin respectfully requests that the Court (a) sustain VLO's Objection (b) deny confirmation of the Plan, or in the alternative, defer a hearing on this matter until the resolution of any claim objections brought by Debtor, and (c) grant The Bank of Austin such other and further relief as is just, proper, and equitable.

Dated this 15th day of March 2021.

Respectfully submitted,

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/s/ Michael Flume

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ATTORNEYS FOR THE BANK OF AUSTIN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 15th day of March 2021 upon all parties registered to receive electronic notice through the Court's CM/ECF system and on the parties listed below either electronically or by first class mail.

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